

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
ALEXANDRIA DIVISION**

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In re:	:	Chapter 11
	:	
Glyn Neal Owen	:	No. 25-11132-KHK
	:	
Debtor.	:	
	:	
-----	X	

RESPONSE TO MOTION TO DISMISS OR CONVERT

NOW COMES Debtor, through counsel, and responds as follows to the Motion to Dismiss or Convert filed by the U.S. Trustee.

1. Admitted.
2. Admitted.
3. Admitted.
4. Denied that Paragraph 4 is an accurate or complete statement of the applicable law.
5. Admitted, as of that time. Denied as of this time, as the reports have been filed. The delay was due at least in part to Debtor's medical issues, as well as delays in obtaining bank statements and (as is often the case with individual debtors) difficulty in using the "data-enabled" US Trustee forms.

Debtor further denies each and every allegation not expressly admitted, and denies that Movant is entitled to the relief requested, or to any relief.

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(703) 734-3800
Counsel for Debtor

Separate and Affirmative Defenses

1. No cause to convert or dismiss exists.
2. Debtor is in the process of working out a negotiated resolution of this case with by far the largest creditor, which will benefit creditors and the estate more than converting or dismissing this case.
3. Converting or dismissing this case is not in the best interests of creditors and the estate.
4. There is a reasonable likelihood that a plan will be confirmed within a reasonable time.
5. Any facts or circumstances deemed to constitute cause have been or will be cured within a reasonable time.

WHEREFORE, Debtor respectfully requests that the Motion be denied.

Dated: October 20, 2025.

Respectfully submitted,

/s/ Daniel M. Press
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CERTIFICATE OF SERVICE

This is to certify that on this 20th day of October, 2025, I caused the foregoing Response to be served on the U.S. Trustee and all parties requesting notice by CM/ECF.

/s/ Daniel M. Press
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